

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

CHRISTOPHER DOHERTY,

Plaintiff,

V.

ENCOUNTERCARE SOLUTIONS, INC., and  
MED VENTURES INC.

## Defendants

Docket Number  
1:16-cv-12655-IT

## JOINT REQUEST TO EXTEND DISCOVERY DEADLINES

The parties jointly request an order extending the current discovery deadlines by sixty (60) days, with fact discovery to conclude on December 29, 2017 instead of October 27. As grounds, the parties state that additional time is needed to complete written discovery before taking depositions, and that no party will be prejudiced by this continuance.

Additionally, Defendants have agreed to produce the documents that are the subject of Plaintiff's Motion to Compel within seven (7) days of this filing, and the parties will confer at that time as to whether there are any outstanding issues that require the Court's attention.

Respectfully submitted,

ENCOUNTERCARE SOLUTIONS INC.  
and MEDVENTURES INC.,  
By their attorneys:

/s/ Emily E. Smith-Lee  
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Plaintiff,  
CHRISTOPHER DOHERTY  
By his counsel,

/s/Jeffrey S. Baker

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I certify that a true copy of the above document was  
served upon each attorney of record by ECF on  
September 21, 2017.

/s/Emily E. Smith-Lee